

RECEIVED

FEB 24 1993

Before the FEDERAL COMMUNICATIONS COMMISSION
Federal Communications Commission OFFICE OF THE SECRETARY
Washington, DC 20554

RECEIVED

FEB 23 1993

In the Matter of

Amendment of Part 97 of the)
Commission's Rules to Set)
Aside a portion of the)
Amateur 222 to 225 MHz Band)
for Other than Repeater Use, and)
Amend the Rules Relative)
to Novice Privileges)

FCC MAIL ROOM

PR Docket 92-289

COMMENTS OF THE CENTRAL STATES VHF SOCIETY

The Central States VHF Society (CSVHFS) submits these comments in response to the Referenced NPRM.

The CSVHFS is a not-for-profit organization chartered in the State of Missouri. It was begun in the mid-1960s to foster amateur radio operation on the bands above 50 MHz. Membership currently numbers about 300, principally in the Midwest states. However, it has members in states from the Atlantic Coast to the West Coast as well as Canada and several foreign countries.

The CSVHFS strongly supports the Commission's the proposal to reserve a portion of the 222 to 225 MHz band for non-repeater use. We feel that it is essential that a portion of this narrow band be available for weak signal/narrow band work.

Many CSVHFS members regularly use the 222 MHz band for long distance terrestrial communication. In years past, a number of our members, and others, have used the 222 MHz band quite extensively for Earth-Moon-Earth (EME) work. This activity has diminished over the past several years, primarily because of apprehension over the future of an amateur allocation in this part of the spectrum. This situation has not appreciably improved since the Commission's re-allocation of 220 to 222 to the Land Mobile Service, since many amateurs are now concerned that there will be little room for weak signal operation on what remains of the band. The Commission's proposal to reserve, even a small portion of the 222 to 225 MHz band for non-repeater use, can be expected to improve this situation markedly.

Prior to the re-assignment, 220.0 to 220.5 MHz was established by the ARRL band plan for CW, SSB and similar narrow-band techniques. Furthermore, the Commission's Rules prohibited Repeater Stations from employing this same portion of the band. With the loss of the lower 2 MHz of the band, a number of repeater operators, especially some in southern California, have expressed the opinion that the remaining 3 MHz wide band affords insufficient space for weak signal operation.

No. of Copies rec'd 0414
List A B C D E

Their contention seems to be that only repeater operation can, and should, now be accommodated in this band. One proposal went so far as to suggest that CW/SSB might be allowed to utilize just 10 kHz from 222.00 to 222.01 MHz. With the first repeater input channel at 222.02 MHz, it is difficult to see how this could work.

The CSVHFS feels that all users must make appropriate adjustments to their former operations, so that everyone can continue to have access to the band. Since forty percent of the band was lost to amateur use by the re-allocation, logic would imply that each type of operation should be left with roughly sixty per-cent of the space it had previously.

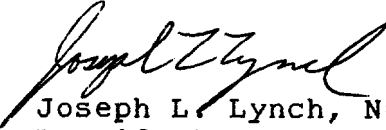
The Commission, following ARRL Petition RM-7869, has proposed 150 kHz for non-repeater operation. This is thirty per-cent of the 500 kHz which was previously available to narrow band/weak signal modes. While the CSVHFS would prefer to have a wider segment reserved for non-repeater use, i.e. 300 kHz (60 % of the former allocation), it nevertheless supports Commission's proposal as contained in the reference NPRM. However, the CSVHFS strongly opposes any attempt to reduce the width of the segment - as may be proposed by some parties.

The CSVHFS also supports the Commission's proposal to allow Novice Class licensees to use the entire 222 to 225 MHz band. We particularly welcome SSB/CW operation by Novice licensees. It is noted that, assuming this portion of the Commission's proposal is made a part of the Rules, this will be the only portion of the VHF spectrum where Novices are allowed to operate in band segments used for weak signal/narrow band techniques.

Because repeater operation is not our prime interest, the CSVHFS feels less strongly about allowing Novices to become repeater licensees and controllers. However, it is observed, that operating a repeater generally requires greater, and different, knowledge than is currently tested in the Novice examination. We feel that it would be inappropriate to burden all applicants for the Novice license, by including repeater related questions on that exam. Thus, it would appear better to continue to require a Technician Class or higher license to engage in repeater operation.

Respectfully Submitted,

Central States VHF Society


Joseph L. Lynch, N6CL
President